

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
CASE NO.: 7:21-CV-00189-BO**

LAYLAH MARSH,

Plaintiff,

-against-

**THE UNIVERSITY OF NORTH
CAROLINA AT WILMINGTON,**

Defendant.

**NOTICE OF CROSS-MOTION
FOR LEAVE TO AMEND
THE COMPLAINT**

Fed. R. Civ. P. 15

Pursuant to Rule 15 of the Federal Rules of Civil Procedure, Plaintiff Laylah Marsh, by and through her attorneys, Nesenoff & Miltenberg, LLP and Thomas, Ferguson & Beskind, LLP, hereby moves this Court for an order granting Plaintiff leave to amend her complaint and granting Plaintiff permission to file her proposed amended complaint.

In support of this Cross-Motion, Plaintiff relies on the accompanying combined Memorandum of Law in Support of Plaintiff's Motion for Leave to Amend and in Opposition to Defendant's Motion for Judgment on the Pleadings. For the reasons set out more fully therein, Plaintiff respectfully requests leave to amend her Complaint.

Respectfully submitted, this the 18th day of February, 2022.

NESENOFF & MILTENBERG, LLP

/s/ Gabrielle M. Vinci

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